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GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF ARGEMIRA FLÓREZ IN  
SUPPORT OF GOOGLE LLC'S MOTION IN  
LIMINE NO. 16 TO EXCLUDE CERTAIN  
PROPOSED DEMONSTRATIVES**

Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 I, Argemira Flórez, hereby declare as follows:

2 1. I am an associate with the law firm Cooley LLP and am counsel for Defendant  
3 Google LLC in the above captioned action. I am duly licensed to practice law in the state of  
4 California and am admitted to practice before this Court. The matters set forth herein are of my  
5 own personal knowledge, and if called as a witness to testify, I could and would testify to these  
6 matters. I submit this declaration in support of Defendant's Motion in Limine No. 16 to Exclude  
7 Certain Proposed Demonstratives, filed concurrently herewith.

8 2. On July 29, 2025, the parties exchanged draft trial demonstratives. Plaintiffs' draft  
9 demonstratives included a presentation for Dr. Jonathan Hochman.

10 3. On Monday, August 18, 2025, Plaintiffs disclosed to Google a list of 32 exhibits, a  
11 deposition transcript, and 71 demonstrative slides that they seek to use during the examination of  
12 their technical expert, Dr. Jonathan Hochman. The slides shown in the Appendix to Motion in  
13 Limine No. 16 are from Dr. Hochman's demonstrative presentation disclosed to Google on August  
14 18, 2025.

15 4. Attached hereto as **Exhibit A** is a true and correct copy of excerpts of the deposition  
16 transcript of Dr. Hochman, dated June 26, 2023.

17 5. Attached hereto as **Exhibit B** is a true and correct copy of excerpts of Dr.  
18 Hochman's expert report, dated March 22, 2023.

19 6. Dr. Hochman has not previously disclosed an opinion on whether Google's  
20 disclosures were misleading.

21 I declare under penalty of perjury under the laws of the State of California and the United  
22 States of America that the forgoing is true and correct.

23 Executed on August 20, 2025, at San Francisco, California.

24  
25  
26 /s/ Argemira Flórez  
27 Argemira Flórez  
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